

EXHIBIT A

MAZIE SLATER KATZ & FREEMAN, LLC
COUNSELLORS AT LAW
103 Eisenhower Parkway
Roseland, NJ 07068
(973) 228-9898
Fax (973) 228-0303
www.mazieslater.com

David A. Mazie*
Adam M. Slater*^o
Eric D. Katz*^o
David M. Freeman
Beth G. Baldinger
Matthew R. Mendelsohn^o

Karen G. Kelsen^o
Cheryll A. Calderon
David M. Estes
Adam M. Epstein^o
Michael R. Griffith^o
Matthew Tonzola
Christopher J. Geddis

*Certified by the Supreme Court of
New Jersey as a Civil Trial Attorney

^oMember of N.J. & N.Y. Bars

October 25, 2019

VIA EMAIL

SAGoldberg@duanemorris.com

Seth A. Goldberg, Esq.
Duane Morris LLP
30 South 17th Street
Philadelphia, Pennsylvania 19103-4196

**RE: *In re Valsartan Products Liability Litigation*, No. 1:19-md-02875
Destruction of Valsartan**

Dear Counsel:

Plaintiffs request that each Defendant confirm whether it has preserved or destroyed any valsartan API or finished dose products, whether or not subject to a recall. For all preserved product, please identify: (i) from whom the product was returned, if applicable, (ii) where the product is being preserved, (iii) by whom the product is being preserved, (iv) the date(s) on which the product went into preservation, (v) the quantities of product being preserved, and (vi) the lot number, batch number, or any other logical identifier used to identify the product being preserved. To the extent any such product currently exists, Plaintiffs specifically request that Defendants continue to preserve and do not destroy it, in compliance with Defendants' preservation obligations under CMO No. 1 (ECF 5) at ¶ 12, and Federal Rule of Civil Procedure 37(e) as well as common law obligations to preserve potential evidence. Further, to the extent Defendants receive in the future any valsartan API or finished dose products, whether or not they are subject to a recall, and which are not new products you are currently manufacturing, packaging, or shipping for sale, Plaintiffs specifically request that Defendants preserve and do not destroy or otherwise dispose of such product, in compliance with Defendants' preservation obligations under CMO No. 1 (ECF 5) at ¶ 12, and Federal Rule of Civil Procedure 37(e) as well as common law obligations to preserve potential evidence.

Seth A. Goldberg, Esq.
Duane Morris LLP
October 25, 2019
Page 2

For valsartan API or finished dose product that has been destroyed or disposed of (other than through shipping for sale), please identify: (i) from whom the product was returned, if applicable, (ii) where the product was stored prior to destruction, (iii) who had possession of the product prior to destruction, (iv) who destroyed or disposed of the product; (v) how product was destroyed or disposed of, (vi) the date(s) on which product was destroyed or disposed of, (vii) the quantities of product destroyed or disposed of, (viii) the lot number, batch number, or any other logical identifier used to identify the product destroyed or disposed of, and (ix) the identity(ies) of the person or persons who authorized the destruction.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Adam M. Slater", written over a horizontal line.

ADAM M. SLATER

Cc: Jessica Priselac, Esq.
(to distribute to all counsel of record for all Defendants in the litigation)